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EG&G ROCKY FLATS

EG&G ROCKY FLATS INC ROCKY FLATS PLANT P.O. BOX 464 GOLDEN COLORADO 80402-0464 (303) 966 7000

July 24 1991

91 RF 4512

Robert M Nelson Jr Manager DOE, RFO

Attn T Lukow

MODULAR TANK PROJECT EJO 986819 JMK 0417 91

It is requested that procurement and installation of the modular tanks to replace the 207B ponds as a repository for seepage from the hillside French drains from the central sump be allowed to proceed. No operations will occur until completion of the IMIRA approval process. The following paragraphs provide the justification for this request.

The fabrication of the tanks must be done on site. The joining of the tank sections must be done when ambient temperatures are greater than 50. F. If timely permission is not received the earliest time frame for installation of the modular tank will become March/April 1992. The attached schedule shows the desired sequence.

The continued pumping of the central sump water into 207B north will cause complications in solidification of the solar pond sludge which will result in increased final waste form volume cost increases in the solidification contract as well as potential schedule impact in meeting the November 8 1992 loss of RCRA interim status

The present projected cost of processing and installing the modular tanks is \$1.6M. The estimated cost of the portable evaporation installation currently in progress is \$5.2M. Thus the increase in cost risk is minimal in comparison with total project costs.

Other alternatives were examined previously in preparation of the project plan and RCRA permit submittal. Given that the water had to be controlled the other options evaluated were as follows.

Increased use of the 374 evaporator Studies conducted in early 1990 demonstrated that sufficient increased capacity was not available and in fact would require major upgrades to the evaporator and distillate distribution system at significant cost and elapsed time

Diverting the central sump water to B series detention ponds would be a violation of the FFCA and NPDES permit in that it would be an uncontrolled discharge

Construction of a surface impoundment rather than the modular tanks was environmentally unsound

ADMIN RECORD

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in conclusion the risk of continuing the procurement and construction of the modular tanks is small in comparison with the risks both cost and environmental of taking no action until the IM/IRA is complete. In view of the unfavorable alternatives evaluated above. I do not believe that the recommended action would prejudice the IM/IRA process. Therefore 1 request that EG&G continue procurement site preparation and tank installation

M Kersh Associate General Manager **Environmental and Waste Management** EG&G Rocky Flats Inc

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